

**IN THE FAUQUIER CIRCUIT COURT OF VIRGINIA  
20th Judicial Circuit of Virginia  
29 Ashby Street, Warrenton, VA 20186-3202**

**Deidre Ann White** : **Dreams Auto Warrenton, Inc.**  
9521 James Madison HWY,  
Warrenton, VA 20167 71 S. 5th St, Suite B,  
Warrenton, VA 20186

: **Alva, Ivan E.**  
5908 Cove Landing Rd., Apt 204,  
Burke, VA, 22015

**Plaintiff** : **Defendants**

**Filed:** 4/14/2020

**RECEIVED**

**Civil Action No:** 061CL2020D21506 **Jury Trial Requested** APR 06 2021

ALEXANDRIA DIVISION  
US BANKRUPTCY COURT

**COMPLAINT**

Plaintiffs Deidre Ann White, by counsel, hereby brings this action against Defendants Alva, Ivan E. and Dreams Auto Warrenton, Inc., for the actions specified herein-below.

**PARTIES**

1. Plaintiff Deidre Ann White [hereinafter White] is a resident of Virginia with a residential address located at 9521 James Madison HWY, Warrenton, VA 20167.
2. Defendant Alva, Ivan E. [hereinafter Alva] is a resident of Virginia with a residential address of 5908 Cove Landing Rd., Apt 204, Burke, VA, 22015.
3. Dreams Auto Warrenton [hereinafter Dreams] is a Virginia company with a principal office located at 71 S. 5th St, Suite B, Warrenton, VA 20186, USA; and an entity ID 04383824. Its registered agent is Mr. Alva, Ivan E.

15. White took the Acura to an automotive mechanic. After running many diagnoses, the mechanic confirms there is an engine problem.
16. Upon removing casing to inspect the engine thermostat, it was discovered the entire open-and-shut-valve mechanism of the thermostat is removed. In essence, the thermostat features are removed. By so doing the engine is modified to operate without a thermostat and becomes unstable.
17. When a fully functioning thermostat is installed, the Acura would not start at all.

**Count I – Actual Fraud on Defective Engine**

18. All paragraphs asserted above and below are incorporated herein with the same force and effect.
19. Alva and Dreams made a misrepresentation of a present and material fact that the Acura is in a good working condition and is a reliable vehicle.
20. Alva and Dreams knowingly and intentionally made this misrepresentation with the intent to mislead White to purchase the vehicle believing it is in a good working condition and is a reliable vehicle.
21. White reasonably relied upon the misrepresentation of Alva and Dreams and purchased the Acura.
22. White suffered loss in the purchase of the Acura because it has an engine problem that was intentionally concealed by replacing a functional thermostat with a dysfunctional thermostat.

*Law Offices Of*  
**LAU & ASSOCIATES, LLC**

**RECEIVED**

Michael N. Lau  
Licensed in VA, DC, IL and US Patent  
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Federal Courts  
-U.S. Supreme Court  
-Court of Appeals of the Federal Circuit  
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APR 06 2021

ALEXANDRIA DIVISION  
US BANKRUPTCY COURT

**BY HAND-DELIVERY**  
MARCH 30, 2021

United States Bankruptcy Court-Eastern District of Virginia  
200 South Washington Street, Room 100  
Alexandria, VA 22314

**OBJECTION TO DISCHARGABLE DEBT**

RE: United States Bankruptcy Court Eastern District of Virginia  
Case No. 21-10325-BFK  
Chapter 7 Bankruptcy of Ivan Eduardo Alva

United States Bankruptcy Court:

This is an objection to discharge debt and/or to challenge whether Certain Debts are  
dischargeable.

Attached are:

1) a Complaint filed to Fauquier Circuit Court on April 14, 2020. The case caption is *Deirdre Ann White v. Dreams Auto Warrenton, Inc. & Ivan E. Alva*. It is a civil Action with a case no.: CL 20-215; and

2) a check in the amount of \$350.00 for this filing.

This is a suit against Co-Defendant Ivan E. Alva, for fraud and misrepresentation in the selling of a vehicle to Deirdre White. I am her legal counsel. Under 11 U.S.C. § 523(a)(4), *inter alia*, debts arise from fraud or defalcation are not dischargeable. I appear *pro se* to protect the award of legal fees to me in handling this misrepresentation/fraud case.

**Certificate of Delivery**

The Undersigned certify a copy of this letter, complaint and Check No. 673, as of March 30, 2021, are hand-delivered to: United States Bankruptcy Court-Eastern District of Virginia, at 200 South Washington Street, Room 100, Alexandria, VA 22314

*1st Class mail to:*  
Suad Bektic, New Day Legal, PLLC, 98 Alexandria Pike, Suite 10, Warrenton, VA 20186. 540-349-3232; [sbektic@newdaylegal.com](mailto:sbektic@newdaylegal.com)

Donald F. King, 1775 Wiehle Avenue, Suite 400, Reston, VA 20190. 703-218-2100;  
[kingtrustee@ofplaw.com](mailto:kingtrustee@ofplaw.com)

Very truly yours,

Michael N. Lau

VSB 72614, appearing *pro se* to protect any  
award of legal fees in handling a fraud case

THE LAW OFFICES OF  
LAU & ASSOCIATES, LLC  
10517 WEST DRIVE, UNIT B  
FAIRFAX, VA 22030  
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United States Bankruptcy Court-Eastern District  
of Virginia  
200 South Washington Street, Room 100  
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The logo for NOVA 220 is centered on the page. It features a stylized globe with a grid pattern, with the number '220' overlaid in a large, bold, sans-serif font. Above the globe, the word 'NOVA' is written in a smaller, bold, sans-serif font. Below the globe, the word 'NOVATEK' is written in a smaller, bold, sans-serif font. The entire logo is rendered in a dark, monochromatic color scheme.